

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: THOMAS JAMES EDWARD SOUL	:	CHAPTER 13
Debtor(s)	:	
	:	
CHARLES J. DEHART, III	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
THOMAS JAMES EDWARD SOUL	:	
Respondent(s)	:	CASE NO. 1-19-bk-03353

TRUSTEE’S MOTION TO RECONSIDER ORDER REINSTATING CASE

AND NOW, this 26th day of October, 2020, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and files this Motion to Reconsider Order Reinstating Case for the following reasons:

1. Movant is Charles J. DeHart, III, Standing Chapter 13 Trustee.
2. Respondent is Thomas James Edward Soul, the debtor in this case.
3. On September 11, 2020, Respondent filed a Motion to Review Dismissal of Chapter 13 case to request this Court to reinstate his case in order for him to convert his case to Chapter 7. (ECF #77)
4. At the hearing on the motion, Respondent reiterated that the purpose of reinstating this case was to convert to Chapter 7.
5. On October 14, 2020, the Court entered an Order Reinstating Case. (ECF #81)
6. Said order does not provide a deadline for debtor to convert his case to Chapter 7.
7. To date, Respondent has not abided by his stated desire to convert his Case to Chapter 7 and therefore remains in Chapter 13 without a confirmable plan. (ECF #72)
8. Movant requests this Court to impose a seven (7) day deadline to convert this case to a Chapter 7 or, upon Certification of Default, his case will again be dismissed.

WHEREFORE, consistent with this motion, Trustee requests this Honorable Court to reconsider the order dated October 14, 2020.

Respectfully submitted:

Charles J. DeHart, III  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-609

BY: /s/James K. Jones  
Attorney for Trustee  
jjones@pamd13trustee.com

CERTIFICATE OF SERVICE

AND NOW, this 26th day of October, 2020, I hereby certify that I have served the within Motion by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Thomas James Edward Soul  
92B Cemetery Avenue  
Stewartstown, PA 17363

/s/Deborah A. Behney  
Office of Charles J. DeHart, III  
Standing Chapter 13 Trustee